

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

IN RE:	)	
	)	Case No. 3:08-bk-11374
GEORGIA DUNN CONE	)	Judge Paine
	)	Chapter 11
Debtor.	)	

**WILLIAM CONE'S LIMITED OBJECTION TO THE PLAN OF REORGANIZATION**

William Cone respectfully submits this limited objection to the Debtor's Plan of Reorganization (Docket #36, the "Plan") and offers the following in support hereof:

**BACKGROUND**

1. On December 2, 2008, the Debtor filed a voluntary Chapter 11 Petition.
2. On October 6, 2009, the Debtor filed the Plan and Disclosure Statement to Accompany the Plan (Docket #35).
3. On October 14, 2009, the Court entered the Order Conditionally Approving the Debtor's Disclosure Statement, Setting Hearing on the Disclosure Statement and Confirmation, and Fixing Time for Filing Acceptances or Rejections of Plan, Combined With Notice Thereof (Docket #42). The Court set November 10, 2009 as the deadline for filing Objections to the Plan and Disclosure Statement and for voting on the Plan.

**OBJECTION**

1. The Plan does not provide for treatment of the unsecured claims in Article III, Section 6 of the Plan. The Plan is also unclear as to the timing of any distributions to unsecured creditors. Undersigned counsel has conferred with Debtor's counsel regarding this and is waiting to receive confirmation that changes Mr. Cone has proposed will be incorporated into the Plan.
2. Mr. Cone preserves his right to object at the confirmation hearing to the

extent an agreement has not been reached with the Debtor.

WHEREFORE, Mr. Cone respectfully objects to the Plan for the reasons stated herein, requests the right to raise additional specific objections, and for such other and further relief as is appropriate and just.

DATED: November 10, 2009

Respectfully submitted,

/s/ Allison E. Batts

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COUNSEL FOR WILLIAM C. CONE

### **CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing has been served on the parties consenting to electronic service on this the 10th day of November, 2009.

/s/ Allison E. Batts

Allison E. Batts